

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

TIFFANY A. RENT,)
T.B. A MINOR DOB 1/31/2003, AND)
T.B. A MINOR DOB 5/30/2009,)

Plaintiffs,)

-vs-)

Case No.: 12-cv-4653

CITY OF CHICAGO, AN ILLINOIS)
MUNICIPAL CORPORATION, POLICE)
OFFICER REGINALD PIPPEN BADGE)
#15512, Individually and as an Agent)
and/or Employee of the City of Chicago.)
POLICE OFFICER RONALD FORGUE)
BADGE #1600, Individually and as an)
Agent and/or an Employee of the City of)
Chicago, POLICER OFFICER DENNIS)
SMITH BADGE #1449, Individually and as)
an Agent and/or an of the City of Chicago,)
AND UNKNOWN CITY OF CHICAGO)
POLICE OFFICERS,)

JURY TRIAL DEMANDED

Defendants.)Aa

COMPLAINT AT LAW

NOW COMES Plaintiffs TIFFANY A. RENT, T.B. A MINOR CHILD DOB 1/31/2003 and T.B. A MINOR CHILD DOB 5/30/2009, by and through their attorneys Keenan J. Saulter and Curtis J. Tarver II of Saulter Tarver LLP and for their Complaint against Defendants CITY OF CHICAGO an Illinois Municipal Corporation, POLICE OFFICER REGINALD PIPPEN, Badge #15512, Individually and as an Employee of the City of Chicago, POLICE OFFICER RONALD FORGUE Badge #1600, Individually and as an Employee of the City of Chicago, POLICE

OFFICER DENNIS SMITH, Badge #1449, Individually and as an Employee of the City of Chicago, and UNKNOWN CITY OF CHICAGO POLICE OFFICERS, state as follows:

Overview

1. This action arises out of an illegal, unwarranted and brutal Taser attack, beating, and false imprisonment of Plaintiff TIFFANY A. RENT while her minor children T.B. A MINOR CHILD DOB 1/31/2003 and T.B. A MINOR CHILD DOB 5/30/2009 were sitting a mere few feet away by Defendants on June 5, 2012.

2. As a result of this attack by the Defendants, members of the City of Chicago Police Department, Plaintiffs were deprived their rights, privileges and/or immunities secured by the United States Constitution and Federal laws, including their Due Process Rights, pursuant to 42 U.S.C. § 1983.¹

Plaintiffs

3. Plaintiffs TIFFANY A. RENT, T.B. A MINOR CHILD DOB 1/31/2003 and T.B. A MINOR CHILD DOB 5/30/2009, were each residents of Northern District of Illinois, Eastern Division at the time of the incident (and remain permanent residents here as of the filing of this action).

¹ 42 U.S.C. §1983. Every person who under color of any statute, ordinance, regulation, custom, or usage, of any State or Territory or the District of Columbia, subjects, or causes to be subjected, any citizen of the United States or other person within the jurisdiction thereof to the deprivation of any rights, privileges, or immunities secured by the Constitution and laws, shall be liable to the party injured in an action at law, Suit in equity, or other proper proceeding for redress, except that in any action brought against a judicial officer for an act or omission taken in such officer's judicial capacity, injunctive relief shall not be granted unless a declaratory decree was violated or declaratory relief was unavailable. For the purposes of this section, any Act of Congress applicable exclusively to the District of Columbia shall be considered to be a statute of the District of Columbia.

Defendants

4. Defendant CITY OF CHICAGO, an Illinois Municipal Corporation, (the “CITY”) is located in the Northern District of Illinois, Eastern Division.

5. Upon information and belief POLICE OFFICER REGINALD PIPPEN, Badge #15512, Individually and as an Employee of the City of Chicago, is a resident of the Northern District of Illinois, Eastern Division and is employed in this District.

6. POLICE OFFICER RONALD FORGUE Badge #1600, Individually and as an Employee of the City of Chicago, is a resident of the Northern District of Illinois, Eastern Division and is employed in this District.

7. POLICE OFFICER DENNIS SMITH, Badge #1449, Individually and as an Employee of the City of Chicago, is a resident of the Northern District of Illinois, Eastern Division and is employed in this District.

8. Upon information and belief the UNKNOWN CITY OF CHICAGO POLICE OFFICERS are residents of the Northern District of Illinois, Eastern Division and are employed in this district.

Jurisdiction and Venue

9. This Court has jurisdiction over Plaintiffs’ claims pursuant to 28 U.S.C. § 1331. Plaintiffs’ claims arise under 42 U.S.C. §1983 and their state law claims arise out of the same subject matter. Moreover the amount in controversy exceeds this Court’s jurisdictional minimum.

10. This Court has Supplemental Jurisdiction over the state law claims pursuant to 28 U.S.C. §1367.

11. Venue is proper as Plaintiffs and Defendants are residents of this judicial district and all of the events that give rise to the case occurred in this judicial district.

Facts Common to All Counts

12. At all times relevant hereto, all Defendants, named and unnamed, were and are duly appointed officers, agents, and/or employees of the CITY.

13. At all times relevant hereto, each and every Defendant was the agent of each and every other Defendant and had the legal duty to oversee and supervise the hiring, conduct, training, employment and discipline of each and every Defendant named and unnamed in this Complaint.

14. At all times relevant hereto, it was the responsibility of the CITY to screen, hire, train, and employ police officers, investigators and detectives for the purposes of providing law enforcement to the residents, inhabitants and any individuals present in the CITY OF CHICAGO at all times.

15. At all times relevant hereto, the CITY employed Defendants PIPPEN, FORGUE, SMITH and the UNKNOWN CITY OF CHICAGO POLICE OFFICERS.

16. At all times relevant hereto, the CITY had a duty to properly hire, supervise train and discipline Defendants PIPPEN, FORGUE, SMITH and the UNKNOWN CITY OF CHICAGO POLICE OFFICERS.

17. At all times relevant hereto, the CITY was a municipality organized pursuant to the laws of the State of Illinois.

18. On or about June 5, 2012, and at all times relevant before and after said date, the CITY screened, hired, trained and employed Defendants PIPPEN, FORGUE, SMITH and the UNKNOWN CITY OF CHICAGO POLICE OFFICERS.

19. On or about June 5, 2012 Defendants PIPPEN, FORGUE, SMITH and the UNKNOWN CITY OF CHICAGO POLICE OFFICERS were acting under the color of authority and in their official capacity as peace officers dully employed by Defendant CITY.

20. On June 5, 2012 while at a Walgreens Drug Store located at 10300 South Michigan Avenue, Chicago, Illinois 60628 Plaintiff TIFFANY A. RENT had an encounter with Defendants PIPPEN, FORGUE, SMITH and the UNKNOWN CITY OF CHICAGO POLICE OFFICERS relating to a parking ticket.

21. Following the issuance of the parking ticket, Plaintiff TIFFANY A. RENT was brutally attacked, shocked with a Taser Gun all while she was visibly eight months pregnant. Plaintiff RENT was also enduring a medically high risk pregnancy at the time.

22. Following the brutal Taser Gun attack, Plaintiff RENT was forcefully taken to the ground and left there while Defendants PIPPEN, FORGUE, SMITH and the UNKNOWN CITY OF CHICAGO POLICE OFFICERS mocked and laughed at Plaintiff RENT writhing on the ground in pain.

23. Plaintiff RENT's children who were with her at the time, T.B. A MINOR CHILD DOB 1/31/2003 and T.B. A MINOR CHILD DOB 5/30/2009, were also unreasonably detained and falsely imprisoned by Defendants.

24. Defendants also charged Plaintiff TIFFANY A. RENT with criminal offenses in an attempt to cover-up the illegal and brutal attacks and false imprisonment that they perpetrated against the Plaintiffs.

25. Following these attacks PLAINTIFF RENT and her unborn child required medical attention in two separate medical facilities.

42 U.S.C. §1983 Claim—Violation of Constitutionally Guaranteed Rights

26. Plaintiffs repeat, reallege and incorporate by reference the allegations contained in Paragraphs 1 through 25 above with the same force and effect as if herein set forth.

27. At all times relevant herein, the conduct of all Defendants was subject to and governed by 42 U.S.C. §1983.

28. At all times relevant herein, the all Plaintiffs were entitled to the rights established by the Fourth Amendment of the United States Constitution.

29. Acting under the color of law, Defendants intentionally and unlawfully made physical contact with their persons and used excessive force to constrain the Plaintiffs which was harmful and offensive without valid cause.

30. Acting under the color of law, Defendants arrested and detained Plaintiffs without probable cause as required by the United States Constitution and by federal law.

31. The Defendants' conduct of attacking, and falsely imprisoning Plaintiffs who committed no criminal conduct was unarmed, was extreme and outrageous.

State Law Claim Intentional Infliction of Emotional Distress

32. Plaintiffs repeat, reallege and incorporate by reference the allegations contained in Paragraphs 1 through 31 above with the same force and effect as if herein set forth.

33. The Defendants' attacking, tasering and falsely imprisoning Plaintiff RENT a mere few feet away from Plaintiff's minor children T.B. A MINOR CHILD DOB 1/31/2003 and T.B. A MINOR CHILD DOB 5/30/2009 was extreme and outrageous.

34. The Defendants either intended to cause, recklessly caused or consciously disregarded the probability of causing extreme emotional distress to the minor Plaintiffs T.B. A MINOR CHILD DOB 1/31/2003 and T.B. A MINOR CHILD DOB 5/30/2009.

WHEREFORE for the foregoing reasons Plaintiff TIFFANY A. RENT, T.B. A MINOR CHILD DOB 1/31/2003 and T.B. A MINOR CHILD DOB 5/30/2009, respectfully request that this Court enter judgment in her favor and against defendants in an amount in excess of \$75,000.00, as assessed by a jury, costs, attorneys' fees, any other legal and equitable remedies available under the law and any other such relief as this Court may deem just and proper.

A Jury Trial is Demanded on Behalf of All Plaintiffs and for All Counts

s/ Keenan J. Saulter

Keenan J. Saulter
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